

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

AT CHARLESTON

UNITED STATES OF AMERICA,

v.

Case No. 2:20-cr-00054

NEDELTCHO VLADIMIROV,

Defendant.

**DEFENDANT'S MOTION TO EXTEND THE DEADLINE
FOR PRETRIAL MOTIONS AND THE PRETRIAL**

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and moves this Honorable Court to Extend the deadline of March 24, 2021 to file Pretrial Motions and to extend the Pretrial Motions Hearing. In support thereof, the Defendant states as follows:

1. The Defense counsel was just appointed as replacement counsel on February 26, 2021, less than one month ago.
2. This case has been pending for eleven (11) months and no pretrial motions were filed prior to this date.
3. The discovery in this matter is voluminous and the Defendant just a couple of days ago received new Grand Jury Transcripts and discovery.
4. The Defendant needs additional time to prepare appropriate Pretrial Motions and to conduct a Pretrial Hearing.

THEREFORE, the Defendant moves this Honorable Court to extend said deadline for Pretrial Motions for a couple of weeks or to whatever time the Court can accommodate and for such other and further relief as this Court deems just.

NEDELTCHO VLADIMIROV,

By Counsel.

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon

Timothy J. LaFon (#2123)
1219 Virginia Street, East, Suite 100
Charleston, West Virginia 25301
Phone: (304)344-4440
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, Timothy J. LaFon, do hereby certify that the foregoing **“Defendant’s Motion to Extend the Deadline For Pretrial Motions and the Pretrial Continue”** has been served upon all parties via the Court’s electronic filing system on the 22nd day of March, 2021:

Andrew Tessman, Esquire
United States Attorney’s Office
P.O. Box 1713
Charleston, West Virginia 25326

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
Timothy J. LaFon (#2123)
Attorney for Defendant